

36999

Response to EPA Comments
on Site Operation Plan
for National Gypsum Company

Millington, Great Swamp, White Bridge Road,
New Vernon Road Sites

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Title Cover

We have changed Pine Valley Tree Service to 257 New Vernon Road on the title cover and throughout the SOP.

Page 2-2, Section 2.2, Paragraph 1

We have added the following sentence:

"Should an immediate health hazard exist, National Gypsum or its agents will immediately notify EPA and NJDEP and shall take all reasonable steps, with the approval of EPA and NJDEP, to mitigate the danger expeditiously."

Page 2-4, Section 2.8, Paragraph 2

All sampling equipment will be certified laboratory clean prior to the commencement of work.

ABD 002 0183

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MDE 0013907

Pages 2-4, 2-5, 2-6, Section 2.8.1, Paragraph 2

All borings will be advanced to bedrock using eight-inch inside diameter augers. Sampling equipment will be laboratory-cleaned prior to sampling and decontaminated between samples using the following procedures:

- ° Initial wash with Alconox detergent
- ° Tap water rinse
- ° Deionized water rinse
- ° Solvent rinse with methanol or acetone
- ° Solvent rinse with hexane (between samples only)
- ° Deionized water rinse or air-dry

Page 2-6, Section 2.8.1

All split spoon samples will be monitored for headspace with an Organic Vapor Analyzer (OVA). The boring for the rock monitoring well will be advanced using an eight-inch inside diameter hollow-stem auger. The well casing will consist of six-inch inside diameter galvanized steel casing.

Page 2-7, Millington Site (Figure 2-2)

The figure is now in accordance with the NJDEP well specification on page A-10 of Appendix I of the Consent Order. Ten (10) feet of open hole is required for the rock monitoring well by Appendix I of the Consent Order on page A-9.

Page 2-8, Millington Site, Paragraph 1, 2, 3

Well permit numbers will be permanently affixed to each monitoring well. All four (4) inch borings will be advanced using eight (8) inch inside diameter hollow stem augers. Wells, constructed of four-inch diameter stainless steel casing and ten-foot long slotted stainless steel screen, will be installed.

ABD 002 0184

MDE 0013908

Page 2-9, Figure 2-3

The figure is now in accordance with the NJDEP well specification on page A-12 in Appendix I of the Consent Order.

Page 2-10, White Bridge Road and 257 New Vernon Road Site

The reference to Pine Valley Tree Service Site has been deleted. In addition, all monitoring wells will be allowed to rest for a minimum of two (2) weeks after development prior to being sampled.

Page 2-14, Section 2.8.4

Particle size analysis will use the following U.S. standard sieve sizes and numbers: 3-inch, 2-inch 1-inch, .75 inch, .50 inch, No. 4, No. 10, No. 20, No. 40, No. 60, No. 100, No. 200.

Page 2-17, 18, 20, Section 2.10.1, Surface Water and Sediment Sampling

Three additional sediment samples will be collected at the following locations:

- 1) Passaic River - The northernmost sample above the confluence with Great Brook.
- 2) Great Brook - Above the confluence with the Passaic River
- 3) Middle Brook - Above the confluence with Black Brook

Page 2-20, Paragraph 2 and Page 2-23, Section 2.10.4, Paragraph 1

Sampling equipment (including bailers) will be decontaminated between samples with Alconox detergent, rinsed with tap water, rinsed with distilled water, rinsed with solvent (methanol or acetone), rinsed with hexane, and rinsed with deionized water.

ABD 002 0185

MDE 0013909

Page 2-20, Section 2.10.1, Paragraph 3

Replicate sediment samples for volatile organic analysis will be collected by splitting the contents of each trowelful of sediment into two equal portions and then placing each portion into its respective container.

Page 2-21, Section 2.10.2

The results from the ambient air sampling for asbestos will be used to predict the emission rate and air quality at the site boundary. The results of the emission tests may indicate that emission control procedures such as wetting down the uncovered fill are necessary during excavation activities. Emission rate ranges will be calculated using a Gaussian dispersion model (See page 2-22).

In addition, five air samples for asbestos fiber counts will be collected during test pit operations at the Millington Site and analyzed by transmission electron microscopy (TEM). Asbestos analysis by TEM will be used to distinguish between types of asbestos and differentiate between asbestos and other fibers.

Page 2-23, Section 2.10.4, Paragraph 1

A cord consisting of teflon-coated wire, single strand stainless steel wire or chain, or polypropylene monofilament will be attached to each bailer.

Page 2-24, Section 2.10.4 and Short Form, Table 5-2

Field-filtering of all groundwater samples for metals analysis will be conducted using disposable filter units with 0.45 micron filters. Prior to filtering, each filter unit will be triple rinsed with groundwater from the well being sampled to ensure that the unit is clean. Metals samples will be analyzed for dissolved metals.

ABD 002 0186

MDE 0013910

Page 2-26, Section 2.10.6

Aqueous volatile organic samples will be collected so that no headspace or air bubbles are left in the vial to prevent the loss of volatile compounds.

Short Form, Table 5-2, Page 5-5, 5-6

Copies of the "Modified" methods 608, 624 and 625 have been included in Appendix A. These methods were taken from the USEPA Contract Laboratory Program's "Statement of Work of Organic Analysis, Multi-Media, Multi-Concentration". In addition, sodium thiosulfate will not be used for aqueous samples since residual chlorine is not expected. The holding time for volatile organics without acid preservative has been changed from 14 days to 7 days in accordance with 40 CFR 136, October 26, 1984.

Short Form, Table 5-1 and 5-3, Page 5-3 and 5-7

The projected number of field replicates, field blanks and trip blanks for each matrix has been added to Table 5-1 for clarification. Table 5-3 provides the total number of field replicates, field blanks, and trip blanks for each parameter. A footnote that a trip blank will be sent with every shipment of volatile organic samples has been added to Tables 5-1 and 5-3.

Short Form, Page 5-14

The sample bottles will be labeled with the following information: site name, sample number, name of collector, date and time of collection, place of collection, type of sample, sample volume, analysis required and preservatives.

Section 6.2, Page 6-2, 6-3, Figure 6-1

An organizational chart which shows the delegation of authority for health and safety purposes is provided in Figure 6-1.

ABD 002 0187

MDE 0013911

Page 6-4, Section 6.2.3

The Site Safety Officer will monitor the work party for signs of stress such as changes in complexion, lack of coordination, changes in demeanor, and changes in speech pattern through visual observation. During adverse weather conditions, the Site Safety Officer will implement special precautions to guard against heat stress or cold exposure as described in EPA's "Standard Operating Safety Guides" (November 1984).

Page 6-5, Section 6.3.1

All personnel will be required to wear Level C protection on-site during soil disturbance activities and inside exclusion areas. Higher levels of protection will be made available if deemed necessary by the Field Team Leader or the Site Safety Officer.

Page 6-6, Section 6.4

The level of protection will be selected in accordance with EPA's "Standard Operating Safety Guides" (November 1984). The selection is based on the potential for exposure to substances in air, splashes of liquids, or other direct contact with material due to work being done, the toxicity of the suspected or measured chemical substances, and professional experience and judgment. Available background information suggests that exposure to airborne asbestos fibers through inhalation is the greatest potential hazard at the Millington and satellite sites.

Page 6-6 and 6-7, Section 6.4.1

The following factors will be used to select adequate respiratory protection: exposure limits, oxygen level, warning properties, protection factor, maximum use limit, and service concentration limit. These factors are discussed in detail in Section 6.4.1.1.

ABD 002 0188

MDE 0013912

Page 6-7, Section 6.4.1.1

Ambient air concentrations at these sites will be determined by collecting air samples for asbestos fiber counts and using the organic vapor analyzer.

Page 6-8, Section 6.4.1.1

Upon experiencing any warning property such as difficulty breathing, eye irritation, headache, strong taste, or smell, the user must immediately leave the site. Dizziness has been removed as a warning property.

Page 6-8, Section 6.4.2, Paragraph 1

Splash goggles will be used for splash protection when necessary.

Page 6-9, Section 6.4.2.1

Level C will be worn on-site during all soil disturbance activities and inside exclusion zones. Modified Level D protection will be adequate on-site in areas outside exclusion zones during non-soil disturbance activities and at off-site sampling locations.

Page 6-9, Section 6.4.2.1

Modified Level D refers to having air-purifying respirators readily available and wearing them when deemed necessary by the Site Safety Officer.

Page 6-12, Section 6.6.2

Decontamination rinse water and waste groundwater will be collected, pumped into a tanker, and sampled to determine the appropriate disposal method.

ABD 002 0189

MDE 0013913